

**AIR POLLUTION CONTROL DISTRICT  
COUNTY OF SAN DIEGO**

**FEDERAL SUBPART HHHHHH – NATIONAL EMISSION  
STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR  
PAINT STRIPPING AND MISCELLANEOUS SURFACE  
COATING OPERATIONS AT AREA SOURCES**

**WORKSHOP REPORT**

A workshop notice concerning implementation of Federal Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources was mailed to all owners or operators of motor vehicle or mobile equipment refinishing facilities permitted or otherwise known by the District. Notices were also mailed to all Economic Development Corporations and Chambers of Commerce in San Diego County, the U.S. Environmental Protection Agency (EPA), the California Air Resources Board (ARB), and other interested parties.

Forms and information relating to the NESHAP can be found at the following District website:  
<http://www.sdapcd.org/rules/wrkshps/wrkshed.html>.

The workshop was held on January 5, 2010, and was attended by 40 people. The workshop comments and District responses are as follows:

**1. WORKSHOP COMMENT**

ARB previously banned the use of the target hazardous air pollutants (HAP) in coatings used in California. Consequently, are affected facilities automatically exempt from the NESHAP because of the State prohibition?

**DISTRICT RESPONSE**

No. The NESHAP specifically regulates coatings containing compounds of cadmium, chromium, lead, manganese, and nickel as target HAP. However, ARB only regulates coatings containing cadmium and hexavalent chromium through an airborne toxic control measure (ATCM) for motor vehicle and mobile equipment coatings. All affected facilities are subject to both the NESHAP and the State regulations.

**2. WORKSHOP COMMENT**

If coatings used at an autobody refinishing shop do not contain target HAP, does this NESHAP apply?

**DISTRICT RESPONSE**

Yes. The NESHAP automatically applies to all spray applied coating operations conducted on motor vehicle and mobile equipment. However, an owner or operator can petition for an exemption from the requirements of the NESHAP if he or she can demonstrate that no spray applied coatings contain target HAP. A facility must submit a Petition for Exemption form to EPA-Region IX and the District, and receive a District exemption before the facility would be considered exempt from the NESHAP.

**3. WORKSHOP COMMENT**

How does the federal rule impact non-military aircraft coating operations?

**DISTRICT RESPONSE**

This rule will apply to facilities using spray applied coatings containing target HAP for non-military aircraft and their components. Space vehicles that are designed to travel beyond the earth's atmosphere are exempt from the NESHAP.

**4. WORKSHOP COMMENT**

In submitting an exemption request, what needs to be provided as documentation to verify the spray applied coatings used do not contain target HAP?

**DISTRICT RESPONSE**

A completed and signed Petition for Exemption form will provide the necessary information. Please send a copy to EPA-Region IX and to the District.

**5. WORKSHOP COMMENT**

If a coating does not contain target HAP, can the coatings be sprayed outside in an open area rather than inside a spray booth?

**DISTRICT RESPONSE**

Spray applying coatings in a spray booth would not be required if the coatings do not contain target HAP and provided the facility has been granted an exemption by the District. However, the District encourages the use of a spray booth if coatings are applied by spraying.

**6. WORKSHOP COMMENT**

Do the NESHAP requirements for stripping operations apply only to aircraft coating operations?

**DISTRICT RESPONSE**

No. All paint stripping operations that use methylene chloride (MeCl) are subject to the NESHAP including but not limited to autobody and aircraft.

**7. WORKSHOP COMMENT**

If paint is stripped using a mechanical method such as sanding and MeCl is not used, then will the NESHAP requirements for paint stripping still apply?

**DISTRICT RESPONSE**

No. The NESHAP specifically applies only to paint stripping operations that use MeCl.

**8. WORKSHOP COMMENT**

Should the Initial Notification Form be sent to EPA-Region IX in San Francisco, or should it be sent to the District?

**DISTRICT RESPONSE**

A copy of the form should be sent to both the District and the EPA-Region IX in San Francisco. The addresses of both agencies are as follows:

U.S. EPA, Region IX  
Director, Air Division  
75 Hawthorne Street  
San Francisco, CA 94105  
Fax: (415) 947-3579

San Diego APCD  
Attn: Kevin Heiss  
10124 Old Grove Road  
San Diego, CA 92131  
Fax: (858) 586-2801  
Kevin.Heiss@sdcounty.ca.gov

**9. WORKSHOP COMMENT**

Should any forms be sent to ARB?

**DISTRICT RESPONSE**

No.

**10. WORKSHOP COMMENT**

Who will provide the painter training that is required by the NESHAP?

**DISTRICT RESPONSE**

The NESHAP does not specify who must provide the painter training. Training courses may be available from paint manufacturers or suppliers, independent training companies, trade schools and community colleges, or through online training resources.

However, the NESHAP does require that the training include hands-on and classroom instruction in spray gun equipment selection, set up and operation, spray technique for different types of coatings, routine spray booth and filter maintenance, and compliance with environmental regulations of the NESHAP. Additionally, the NESHAP requires that records be kept to document and certify employee training. An Owner/Operator Certification for Employee Painter Training template has been added to the District's workshop website.

DR:jl  
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